

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

|                           |   |                     |
|---------------------------|---|---------------------|
| UNITED STATES OF AMERICA, | ) |                     |
|                           | ) |                     |
| Plaintiff,                | ) |                     |
|                           | ) |                     |
| vs.                       | ) |                     |
|                           | ) | No. 4:19-cr-554 AGF |
| TERICO C. DUDLEY,         | ) |                     |
|                           | ) |                     |
| Defendant.                | ) |                     |
|                           | ) |                     |

**GOVERNMENT’S MOTION TO REVOKE PRETRIAL RELEASE**

COMES NOW, the United States of America, by and through Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Dianna R. Collins, Assistant United States Attorney for said District, and moves this Court to revoke the pretrial release granted by this Honorable Court.

On August 6, 2019, the Court denied the Government’s Motion for Pretrial Detention and set an appearance bond with an Order of Conditions. Since this date, Defendant has had numerous violations of his bond. Specifically, on or about January 22, 2020, violated a condition of release by having access to instant messaging, chat rooms or chat programs in violation of DCD 19, para. 7(s). This activity took place immediately prior to the defendant’s Status Hearing on January 23, 2020 and this activity was not addressed at that Status Hearing. At that hearing, this Court addressed the following violations:

1. August 6, 2019- making an unauthorized stop while on location monitoring in violation of DCD 19, para. 7(q);
2. August 10, 2019- failing to report for drug testing in violation of DCD 19, para. 7(n);
3. August 16, 2019- visiting a music chat website in violation of DCD 19, para. 7(s);
4. August 21, 2019- failing to report for drug testing in violation of DCD 19, para. 7(n);
5. August 27, 2019- failing to submit location monitoring schedule in violation of DCD 19, para. 7(q);
6. September 5, 2019- failing to follow procedures of requesting drug testing schedule in violation of DCD 19, para. 7(n);
7. September 12, 2019- failing to follow procedures of requesting drug testing schedule in violation of DCD 19, para. 7(n);
8. September 12, 2019- contacting his Pretrial Officer on cell phone outside of business hours for non-emergency purposes in violation of DCD 19, para. 7(a);
9. September 25, 2019- failing to submit location monitoring schedule in violation of DCD 19, para. 7(q);
10. September 30, 2019- visiting pornography websites in violation of DCD 19, para. 7(s);
11. October 5, 2019-October 15, 2019- visiting pornography websites on multiple occasions in violation of DCD 19, para. 7(s) ;
12. October 6, 2019- failing to submit location monitoring schedule in violation of DCD 19, para. 7(q);
13. October 7, 2019- failing to submit location monitoring schedule in violation of DCD 19, para. 7(q);

14. October 7, 2019- admitting to using marijuana in violation of DCD 19, para. 7(m);
15. October 8, 2019- failing to submit location monitoring schedule in violation of DCD 19, para. 7(q);
16. October 8, 2019 (first)- making an unauthorized stop while on Location Monitoring in violation of DCD 19, para. 7(q);
17. October 8, 2019 (second) – making an unauthorized stop while on Location Monitoring in violation of DCD 19, para. 7(q);
18. October 11, 2019- failing to report for drug testing in violation of DCD 19, para. 7(n);
19. October 21, 2019-failing to report for drug testing in violation of DCD 19, para. 7(n);
20. October 21, 2019- visiting pornography file sharing websites and a pornography chat website in violation of DCD 19, para. 7(s);
21. October 22, 2019- submitting diluted urine samples in violation of DCD 19, para. 7(n);
22. October 24, 2019- failing to follow procedures of requesting drug testing schedule in violation of DCD 19, para. 7(n);
23. October 25, 2019- submitting a urine sample that tested positive for the use of marijuana in violation of DCD 19, para. 7(m) ;
24. October 25, 2019- failing to submit location monitoring schedule in violation of DCD 19, para. 7(q);
25. November 1, 2019- failing to call in weekly as directed on six prior occasions with Pretrial officer in violation of DCD 19, para. 7(a);
26. November 10, 2019- submitting diluted urine samples in violation of DCD 19, para. 7(n);

27. November 12, 2019- failing to make weekly call with Pretrial officer in violation of DCD 19, para. 7(a);
28. November 18, 2019- failing to follow procedures of requesting drug testing schedule in violation of DCD 19, para. 7(n);
29. November 18, 2019- contacting his Pretrial Officer on cell phone outside of business hours for non-emergency purposes in violation of DCD 19, para. 7(a);
30. November 19, 2019- failing to make weekly call with Pretrial officer in violation of DCD 19, para. 7(a);
31. November 26, 2019- failing to make weekly call with Pretrial officer in violation of DCD 19, para. 7(a);
32. December 24, 2019- failing to make weekly call with Pretrial officer in violation of DCD 19, para. 7(a);
33. January 2, 2020- texting a third party through an internet chat program in violation of DCD 19, para. 7(s);
34. January 7, 2020- failing to make weekly call with Pretrial officer in violation of DCD 19, para. 7(a);
35. January 9, 2020- texting a third party through an internet chat program in violation of DCD 19, para. 7(s);

On or about February 21, 2020, the defendant submitted a urine sample for drug testing that tested positive for the use of marijuana in violation of DCD 19, para. 7(m). The defendant acknowledged this violation and admitted to smoking marijuana when his mother, who is being treated for lung cancer, was taken to the emergency room. Conditions of the defendant's

pretrial release Order state that he may not use or unlawfully possess a narcotic drug or other controlled substance, unless prescribed by a licensed medial professional.

There is clear and convincing evidence that the defendant has violated conditions of his release and that the defendant is unlikely to abide by any condition or combination of conditions of release. As such, the United States requests that defendant be taken into custody and his bond be forfeited pursuant to Title 18, United States Code, Section 3148.

Accordingly, the United States respectfully requests that the defendant's conditions of release be revoked and a warrant for his arrest issued.

Respectfully submitted,

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s/ Dianna R. Collins  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.